

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

TruePosition, Inc.,)	
)	
Plaintiff/)	
Counterclaim-Defendant,)	
)	Civil Action No. 05-00747(SLR)
v.)	
)	
Andrew Corporation,)	
)	
Defendant/)	
Counterclaim-Plaintiff.)	
_____)	

TRUEPOSITION'S PROPOSED VOIR DIRE TO JURY PANEL

Good morning, ladies and gentlemen. I am Judge Robinson, and I will be presiding over the trial for which a jury is about to be drawn in the case captioned TruePosition, Inc. v. Andrew Corporation. Briefly stated, this case is a civil action brought by plaintiff TruePosition, Inc. against the defendant Andrew Corporation.

The trial is expected to last 9 days. However, jury deliberations may require you to be present longer than 9 days. Our trial days will run approximately from 9:30 a.m. to 4:30 p.m.

TruePosition is represented by Paul Milcetic, Kathleen Milsark, Lynn Morreale, Dale Heist, Daniel Goettle and Amanda Kessel attorneys with Woodcock Washburn LLP, and by James Heisman, an attorney with Connolly Bove Lodge & Hutz LLP. Defendant is represented by Gregory S. Arovas, John M. Desmarais, Todd M. Friedman, Shira J. Kapplin, Avinash S. Lele, Michael A. Parks, Regan A. Smith and Rachel Pernic Waldron, attorneys with Kirkland & Ellis and by Josy Ingersoll and Andrew Lundgren, attorneys with Young Conoway Stargatt & Taylor LLP.

In the light of this brief summary, I will ask the panel certain questions, the purpose of which is to: (1) enable the court to determine whether or not any prospective juror should be excused for cause; and (2) enable counsel for the parties to exercise their individual judgment with respect to peremptory challenges, that is, challenges for which no reason need be given by counsel. If any of you answer any question “yes,” please stand up and, upon being recognized by the court, state your juror number. When I have concluded asking all the questions, we will call you to the bench individually to speak with you about your affirmative response or responses.

HAVE CLERK ADMINISTER THE OATH TO THE PANEL

1. Is any member of the panel personally acquainted with any officer, director, or employee of, or ever done business with, TruePosition, Inc.?
2. Is any member of the panel personally acquainted with any officer, director, or employee of, or ever done business with, Andrew Corporation?
3. Is any member of the panel related to, or personally acquainted with, Paul Milcetic, Kathleen Milsark, Lynn Morreale, Dale Heist Daniel Goettle, Amanda Kessel or James Heisman, plaintiff’s attorneys or ever been represented by them or any associate or member of their law firms, Woodcock Washburn LLP and/or Connolly Bove Lodge & Hutz LLP?
4. Is any member of the panel related to, or personally acquainted with, Gregory S. Arovas, John M. Desmarais, Todd M. Friedman, Shira J. Kapplin, Avinash S. Lele, Michael A. Parks, Regan A. Smith, Rachel Pernic Waldron, Josy Ingersoll or Andrew Lundgren, defendant’s attorneys or ever been represented by them or any

associated or member of their law firms, Kirkland & Ellis and/or Young Conaway
Stargatt & Taylor LLP?

5. Is any member of the panel related to, or personally acquainted with, any
of the following individuals who might appear as witnesses in this case:

- a) Brian Agee
- b) Khalid Al-Mufti
- c) Michael Amarosa
- d) Robert Anderson
- e) Andrew Beck
- f) Frederic Beckley
- g) Gary Brown
- h) John Carlson
- i) Kevin Donaghy
- j) Mohamed Eissa
- k) Mazin Fagiri
- l) Terry Garner
- m) David Goodman
- n) Oded Gottesman
- o) Robert Gross
- p) Douglas E. Hall
- q) Wayne Hoeberlein
- r) Michael Hoppman
- s) Iris Inbar

- t) Stuart Katz
- u) Joseph Kennedy
- v) Curtis Knight
- w) Alan Li
- x) Oskar Magnusson
- y) James McDaniel
- z) Khalid Al Mufti
- aa) Carla Mulhern
- bb) Dewayne Perry
- cc) Jim Petelle
- dd) Rhys Robinson
- ee) Joseph Sheehan
- ff) John Webber
- gg) Randy Wynn

6. Does any member of the panel have any personal knowledge of this case, or have you read or heard it discussed, or have an opinion regarding it?
7. Has any member of the panel ever been a plaintiff or a defendant in a civil lawsuit?
8. Has any member of the panel ever served as a juror in a civil lawsuit?
9. Has any member of the panel ever participated in a standards setting body, including a technical standards setting body such as 3GPP, the European Telecommunications Standards Institute, the International Telecommunication Union, the

American National Standards Institute or the Institute of Electrical and Electronics Engineers?

10. Does any member of the panel have any special disability or problem that would make it difficult or impossible for you to serve as a member of the jury in this case?

11. Does any member of the panel know of any other matter which you believe should be called to the court's attention as having some bearing upon your qualifications or ability to sit as a juror, or which you think may prevent you from rendering a fair and impartial verdict based solely upon the evidence and my instructions as to the law?

Respectfully submitted,

DATED: August 24, 2007

By:

/s/ James D. Heisman

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CERTIFICATE OF SERVICE

I, James D. Heisman, hereby certify that on this 24th day of August, 2007, I caused a true and correct copy of the foregoing **TRUEPOSITION'S PROPOSED VOIR DIRE TO JURY PANEL** to be served upon the following individuals in the manner indicated below:

Via hand-delivery

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/s/ **James D. Heisman**

James D. Heisman, Esq. (#2746)